

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2022 OCT 20 PM 2:30

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UNITED STATES OF AMERICA

v.

JOSE ALVAREZ and  
DAVID RODRIGUEZ-CRUZ,  
Defendants.

Case No. 2:22-cr-117-1-2

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

Between on or about September 16 and September 25, 2022, in the District of Vermont and elsewhere, the defendants JOSE ALVAREZ and DAVID RODRIGUEZ-CRUZ, conspired with each other, and others known and unknown to the Grand Jury, to commit alien smuggling by transporting and moving aliens within the United States, knowing or recklessly disregarding of the fact that the aliens had come to, entered, and remained in the United States in violation of law, and the transportation and movement would further such violation of law.

8 U.S.C. § 1324(a)(1)(A)(v)(I)

**COUNT TWO**

On or about September 25, 2022, in the District of Vermont, the defendant, JOSE ALVAREZ, knowing and in reckless disregard of the fact that certain aliens—including W.M.-S. —had not received prior official authorization to come to, enter, or reside in the United States, brought and aided and abetted in bringing those aliens to the United States for the purpose of commercial advantage and private financial gain.

8 U.S.C. § 1324(a)(2)(B)(ii) & 18 U.S.C. § 2

**COUNT THREE**

On or about September 25, 2022, in the District of Vermont, the defendant, JOSE ALVAREZ, knowing and in reckless disregard of the fact that certain aliens—including W.M.-S. —had come to, entered, or remained in the United States in violation of law, transported and moved, and attempted to transport and move, such aliens within the United States by means of transportation, in furtherance of such violation of law.

8 U.S.C. § 1324(a)(1)(A)(ii)

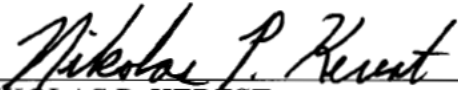
**COUNT FOUR**

On or about September 25, 2022, in the District of Vermont, the defendant DAVID RODRIGUEZ-CRUZ, knowing and in reckless disregard of the fact that certain aliens—including A.P.-N.—had come to, entered, or remained in the United States in violation of law, transported and moved, and attempted to transport and move such aliens within the United States by means of transportation, in furtherance of such violation of law.

8 U.S.C. § 1324(a)(1)(A)(ii)

A TRUE BILL

  
FOK PERSON  


 (MPD/MJL)  
NIKOLAS P. KEREST  
United States Attorney  
Burlington, Vermont  
October 20, 2022